

## Los Padres Objection Issue Summary – Wilderness and Roadless

### Objectors:

- **Los Padres Forest Watch (LPFW), Center for Biological Diversity, The Wilderness Society, Western Watersheds Project, California Native Plant Society, California Chaparral Institute, California Wilderness Coalition, Keep Sespe Wild, et. al., Jeff Kuyper and Ileene Anderson**
- **California Chaparral Institute (CCI), Richard W. Halsey**

### Summary:

In general, the Objectors disagree with the Los Padres National Forest's (LPNF) decision to not designate Recommend Wilderness (RW) for Inventoried Roadless Areas (IRAs) across the forest.

CCI objects to the USFS's rejection of wilderness values for IRAs that were not recommended as wilderness in Alternative 2a. They state "Much of the Los Padres represents pristine Wilderness values."

LPFW objects to several IRAs not being recommended as wilderness and states that "The FEIS erroneously relies on external 'sights and sounds' and other ineligible criteria to eliminate areas from wilderness consideration". LPFW also states "The FEIS unreasonably rejects a recommended wilderness designation for portions of..." seven IRAs within the forest, including Antimony, Cuyama, Diablo, Fox Mountain, Juncal, Sawmill-Badlands and White Ledge.

### Review Team Analysis:

LPNF appropriately applied FSH 1909.12, Chapter 70, Wilderness Evaluation, evaluating areas for potential recommendation as wilderness by completing assessments of wilderness "capability", "availability" and "need" for each roadless area. The evaluation in the FSEIS Appendix 2 adequately describes the capability, availability and need for the various IRAs as Recommended Wilderness (RW). Recommending wilderness is a process of weighing numerous characteristics against each other. One resource or need does not automatically outweigh another resource or need.

For three of the objection points related to IRAs, the evaluations seem to match the rationale displayed in the Draft ROD. LPFW states that LPNF used ineligible criteria, but the criteria used are identified in the FSH 1909.12, Chapter 70 and displayed in Appendix 2 of the FSEIS.

The fourth objection point related to the Antimony IRA. There appears to be some inconsistencies needing clarification in the Draft ROD. Specifically, the evaluation in Appendix 2 seems to point out some moderate to high wilderness values, but the decision rationale in the ROD does not thoroughly explain why despite these moderate to high valued wilderness characteristics the area was not recommended as wilderness. A clearer connection between the

evaluation in Appendix 2 of the FSEIS and the rationale in the Draft ROD should be made, including any limiting factors that would preclude the various IRAs from being recommended as wilderness.

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#### REMEDY(S) PROPOSED BY OBJECTORS

- Revise the IRA Analysis for these IRAs. In the alternative, the USFS may wish to place a Recommended Wilderness land use zoning classification across much of these areas, with certain minor adjustments as necessary.
- Revise the IRA Analysis for the Antimony IRA. In the alternative, the USFS may wish to place a Recommended Wilderness land use zoning classification across much of this area, with certain minor adjustments as necessary.
- We recommend that the IRA Analysis contain a scoring system so that the public can gain a better understanding of how the wilderness capability, suitability, and need criteria are weighed to guide the agency's decision on whether to recommend an area for wilderness protection.

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#### INSTRUCTIONS BEING CONSIDERED

- A more specific rationale should be provided in the Draft ROD that better supports and more clearly connects to the information provided in the IRA evaluation in Appendix 2 of the FSEIS, including if and how any higher value factors may have influenced the draft decision. The improved rationale would replace or supplement the rationale in the Draft ROD for Antimony IRA.